

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. S1-4:14CR00088 RWS (SPM)
)	
DIONNE GATLING, et al.,)	
)	
Defendants.)	

**GOVERNMENT'S MOTION FOR EXTENSION OF
TIME TO FILE ITS POST-HEARING BRIEF**

COMES NOW the United States of America, by and through its attorney, Carrie Costantin, Acting United States Attorney for the Eastern District of Missouri, and Dean R. Hoag and Michael A. Reilly, Assistant United States Attorneys for said District, and respectfully requests a three-week extension of time, up to and including, Friday, August 11, 2017, in which to file its post-hearing brief. In support thereof, the Government states as follows:

1. The Government's post-hearing brief is currently due on July 21, 2017.
2. The Government has made substantial progress on its post-hearing brief, but remains in the process of preparing its response.
3. The Government and Defense Counsel are in the process of conducting supplemental investigation, which is limited in scope, but nonetheless has required time to arrange and will require a travel day on Friday, July 21, 2017.
4. AUSA Hoag, over the past several weeks has been preparing the memorandums regarding a pending indictment of a death-penalty eligible case, as well as working on multiple ongoing Title III cases; AUSA Hoag has also been tending to other matters.

5. In addition to this case, undersigned AUSA Reilly is assigned to several complex multi-defendant narcotics conspiracy cases, two of which have multiple charged homicides: (1) *United States v. Velazquez, et al*, S4-4:15CR 404 HEA/NAB (continuing criminal enterprise, conspiracy, and multiple homicides); and (2) *United States v. Stewart and Wilson*, S1-4:15CR 441 CDP (with AUSA Hoag; conspiracy and multiple homicides); and (3) *United States v. Oscar Dillon and Roy Burris*; 4:17CR 95 RWS/PLC (with AUSA Hoag; conspiracy involving Title III investigation).

4. Counsel is actively engaged in different facets of each of these matters. In *United States v. Velazquez, et al*, there are thirty-four defendants, of whom approximately seven are death eligible. Counsel is in the process of extending plea agreements to most of the non-death eligible defendants in advance of an upcoming deadline for the filing of pretrial motions. The plea negotiation process is significant to further judicial economy in that particular complex case. The plea negotiation process and other aspects of the *Velazquez* case require Counsel's immediate attention to further judicial economy. Therefore, Counsel requests an extension of three weeks in this matter.

4. AUSA Reilly has also allocated time over the past several weeks to trial Preparation as co-counsel in *United States v. Druger*, 4:16CR 380 CDP, involving a complex Title III narcotics distribution conspiracy and firearms charges.

5. AUSA Reilly has a previously scheduled out of town vacation and will be out of the office beginning on July 22, 2017, and will return on July 31, 2017.

WHEREFORE, the Government respectfully requests an additional three weeks, up to and including, August 11, 2017, to file its post-hearing brief.

Respectfully submitted,

CARRIE COSTANTIN
Acting United States Attorney

/s Michael A. Reilly
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CERTIFICATE OF SERVICE

I hereby certify that on July 20, 2017, the foregoing was filed electronically under seal with the Clerk of the Court and a copy to be served by e-mail upon the following:

Attorneys of Record.

/s Michael A. Reilly
DEAN R. HOAG, #23843MO
MICHAEL A. REILLY, #43908MO
Assistant United States Attorneys